## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA HAMMOND DIVISION

JEFFREY R. YESSENOW, M.D., Plaintiff,	) ) )
v.	) CAUSE NO. 2:08-CV- 353 PPS
HILTON M. HUDSON II, M.D., individually and d/b/a HILTON PUBLISHING, INC., an Illinois Corporation, LEROY J. WRIGHT, individually and n/k/a WRIGHT CAPITAL GLOBAL EQUITIES, LLC, an Illinois Limited Liability Corporation a/k/a LJW GLOBAL EQUITIES d/b/a WRIGHT CAPITAL PARTNERS, LLC, an Illinois Limited Liability Corporation f/k/a WRIGHT GROUP INTERNATIONAL HOLDINGS, LLC.,	) ) ) ) ) ) ) ) ) ) ) ) ) ) ) )
Defendants.	, )

## PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff, Jeffrey R. Yessenow, through this attorney, pursuant to Federal Rule of Civil Procedure 65(a), hereby move this Court for a Preliminary Injunction freezing Defendants' assets, and states in support as follows

- 1. Plaintiff filed a Motion for Temporary Restraining Order in Indiana State Court on November 21, 2008.
  - 2. The case was removed to this Court on January 5, 2009.
- 3. Plaintiff hereby incorporates the Motion for Temporary Restraining Order filed in state court as if plead herein.
- 4. Upon removal, Plaintiff was ordered to file a Supplemental Memorandum in support of its Motion for Temporary Restraining Order.

- 5. The same order of this Court scheduled a hearing on the Motion for February 27, 2009.
  - 6. Plaintiff filed its Supplemental Memorandum on January 29, 2009.
  - 7. Defendants filed their Response on February 10, 2009.
  - 8. Plaintiff filed its reply on February 17, 2009.
- 9. As both sides have notice of the Motion for a Temporary Restraining Order and a hearing is scheduled, Plaintiff requests that this Motion be heard at the schedule hearing on February 27, 2009.

WHEREAS, for all the reasons stated in the Motion for Temporary Restraining Order, Memorandum in Support and Reply in Support, Plaintiff hereby requests that the Motion for Preliminary Injunction be granted. Respectfully Submitted,

/s/ Paul A. Rossi

Paul A. Rossi Law Office of Paul A. Rossi, LLC 725 East Commercial Avenue Lowell, Indiana 46356 Telephone: (219) 690-1200 Attorney for Plaintiff paulrossi@paulrossilaw.com

## **CERTIFICATE OF SERVICE**

I certify that on February 17, 2009, the forgoing was electronically filed with the Clerk of the Court using the CM/EMF system which sent notification of such filing to the following:

> Harold R. Bickham hbickham@btlaw.com

Jennifer Westerhaus Adams jadams@btlaw.com

Barnes & Thornburg 11 South Meridian Street Indianapolis, Indiana 46204

/s/ Paul A. Rossi

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